



GP PLANNING LTD



# PLANNING STATEMENT

REGULARISATION, CONSOLIDATION AND EXTENSION TO THE  
EXISTING WASTE TRANSFER & RECYCLING FACILITY

ELBRIDGE FARM RECYCLING CENTRE,  
BOGNOR REGIS, PO21 5EF

RECYCLE SOUTHERN LTD

JUNE 2023

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Planning Statement		
Extension to WTS	Recycle Southern Ltd	R009-04

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# 1 INTRODUCTION

## 1.1 Context

- 1.1.1 This Planning Application is submitted to West Sussex County Council, on behalf of Recycle Southern Limited (the Applicant), seeking planning permission to consolidate and regularise the existing waste management operations and extend the existing Materials Recycling Facility and Waste Transfer Station at Elbridge Farm Recycling Centre, Bognor Regis, PO21 5EF (the Application Site).
- 1.1.2 A Planning Application (reference WSCC/007/22) was submitted on 23rd March 2022 seeking a variation to conditions 2 and 11 of planning permission WSCC/036/14/BE to increase throughput of waste from 30,000 tonnes per annum to 75,000 tonnes per annum and seek approval for minor changes to the site layout. This application was withdrawn in July 2022 in order to address planning and environmental issues raised by the Waste Planning Authority. This Planning Application therefore seeks to address the identified planning issues and seeks an extension to the site to provide more capacity and improved efficiency of the recycling and waste transfer operations.
- 1.1.3 The Company has realised a significant increase in demand from customers due to a lack of appropriate waste recycling/waste transfer facilities in this area of the County and the closure of a number of landfill sites. The Applicant's waste management facility is one only a few waste management facilities in the locality. There is therefore a need to retain this facility and extend it in order to provide more operational space to accommodate the demand of the Applicant's customers.
- 1.1.4 The submission includes the following information, documents and drawings:

### Documents

- Planning Form/Certificates
- Planning Statement (this document) and associated Appendices

### Drawings

- Approved Site Layout Plan - GPP/GRA/BR/14/04 Rev 6 (with vehicle movements)
- Site Location Plan reference - GPP/GRA/BR/EXT22/01 Rev 4
- Site Layout Plan reference - GPP/GRA/BR/EXT22/02 Rev 15
- Elevations of Aggregate Bays - GPP/GRA/BR/EXT22/04 Rev 01
- Main Building Elevations - GPP/GRA/BR/EXT22/05 Rev 01

- Existing Weighbridge Office - GPP/GRA/BR/14/05 Rev 01.
- Landscape Planting Plan - 2414-TFC-00-00-DR-L-1001-P05

## 1.2 The Application Site and its Setting

- 1.2.1 The Application Site is known as Elbridge Farm which was formerly a farm holding. In 2006, permission was granted to change the use of the main buildings on site to B1/B2/B8 land uses.
- 1.2.2 The existing waste management site is approximately 0.7 hectares in size and is located approximately 750 metres north of the edge of North Bersted (on the edge of Bognor Regis) and approximately 4.6 kilometres south-east of Chichester. The existing site comprises a hardcore surface and areas of impermeable concrete surfaces. The site is located at the Elbridge Farm Business Park and sits in proximity to other uses which have been established on the wider Elbridge Farm Business Park. Those uses comprise a mixture of small light industrial uses and other uses such as a stonemasons and joinery.
- 1.2.3 The Application Site (referred to as the Site hereafter) is approximately 1.5 hectares in size. The Site includes the proposed extension area and the existing permitted site area so that, on the basis planning permission is granted, one consolidating planning permission controls the operations. The current Planning Application will also enable the regularisation of breaches of planning control relating to the throughput of materials and matters relating to the layout of the site. Unit 21 within the Farm Business Park is excluded from the Application Site because it is let to another commercial user and is not therefore part of this Planning Application.
- 1.2.4 The Site is bounded on its northern eastern boundary by agricultural land. To the west of the site there runs a brook.
- 1.2.5 Access will be gained to the Application Site via the A259, a strategic lorry route connecting Bognor Regis to the east and Chichester to the west. Access to the site is provided through the former Elbridge Farm Business Park.
- 1.2.6 The closest sensitive receptor is the Elbridge Farmhouse, which is a tenanted residential property. The property sits adjacently to the southwestern boundary of the site. In the wider area, a car showroom is located opposite side of the A259 from the Elbridge Farm Business Park. Further to the south there are some residential properties located in a ribbon along the A259 (approximately 300m from the site) on the edge of North Bersted. To the north the village of Colworth is located approximately 600 m from the site.

- 1.2.7 The majority of the site is situated in flood zone 1, with a small area located in flood zone 2 along the northern boundary.

### **1.3 Planning History**

- 1.3.1 Arun District Council granted planning permission on 10 August 2010 for the 'change of use of barn from agriculture to B1/B2/B8 use for the agricultural units and associated yard that are the subject of this application'. The planning permission reference for the change of use of the buildings is BE/55/10.
- 1.3.2 On 4<sup>th</sup> September 2014 West Sussex County Council granted planning permission (reference WSCC/036/14/BE) for a 'change of use to a waste transfer station and materials recycling facility'.
- 1.3.3 Planning Application (reference WSCC/007/22) was submitted on 23rd March 2022 seeking a variation to conditions 2 and 11 of planning permission WSCC/036/14/BE to increase throughput of waste from 30,000 tonnes per annum to 75,000 tonnes per annum and seek approval for minor changes to the site layout. This application was withdrawn in July 2022.

## 2 PROPOSED DEVELOPMENT

### 2.1 Introduction & Background

- 2.1.1 The Applicant has been operating the existing waste transfer station and materials recycling facility at Eldridge Farm since 2014 under the auspices of planning permission reference WSCC/036/14/BE (enclosed at Appendix 1 to this report).
- 2.1.2 The Eldridge Farm Recycling Centre is one of only a few waste management facilities in the locality. In recent years, Lidsey Landfill site and Hambrook Landfill site have closed which has resulted in the site be required to manage and recycle more construction and demolition waste. There has also been repeated fires and the local amenity site in Westhampnett creating additional pressure on the Eldridge Farm site to recycle and manage more waste.
- 2.1.3 The Application Site is approximately 1.5 hectares in size and is shown edged red on the Site Location Plan drawing GPP/GRA/BR/EXT22/01 Rev 4. The Site includes the proposed extension area and the existing permitted site area so that, on the basis planning permission is granted, one consolidating planning permission controls the operations. The current Planning Application will also enable the regularisation of breaches of planning control relating to the throughput of materials and matters relating to the layout of the site and associated structures.

### 2.2 Approved Development

- 2.2.1 The existing site has planning permission to recycle Construction and Demolition (C&D) waste and Commercial and Industrial (C&I) waste, which is sorted to recover significant amounts of material for recycling and re-use. The site currently has planning permission for a throughput of 30,000 tonnes of waste a year. The approved Site Layout Plan (GPP/GRA/BR/14/04 Rev 6 with vehicle movements) is enclosed with this Planning Application for reference.
- 2.2.2 Currently, all mixed skips are delivered to the waste reception building, where they will be emptied inside the building and the material sorted to recover paper, card, plastics, metals and timber. Any hardcore/soils contained in the skips will also be recovered for further sorting under cover in the building to the rear of the waste storage building. Paper, card and plastics is moved into the adjoining building for storage and baling pending collection in bulk loads. Timber and metals are stored in open containers in the yard outside the storage building and residual waste will be stored in covered containers. Once full, the containers will be collected for transfer off site.

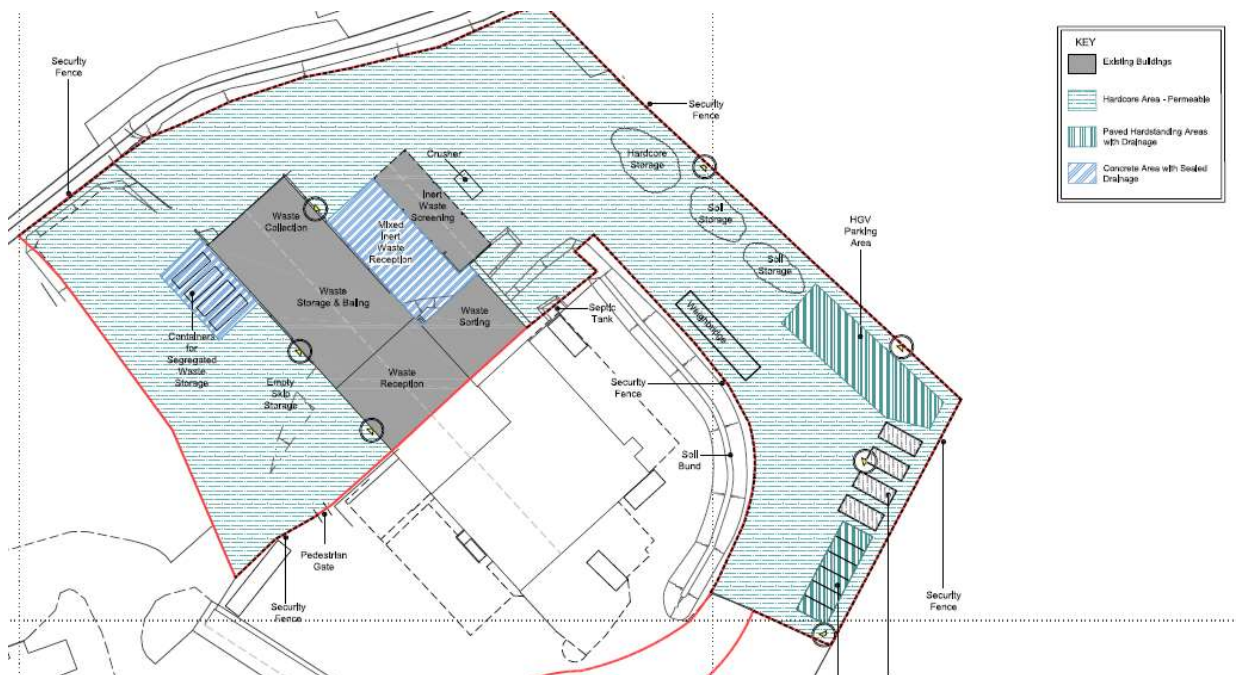


2.2.3 Inert waste loads are delivered to the yard at the rear of the waste storage building. Those materials are sorted using a trommel screen under cover in the existing farm barn. Recovered soils are stockpiled in the yard to the east. Oversize hardcore is crushed alongside the screening operations and processed hardcore is stored in stockpiles in the yard to the east. The site has offices and parking sited along the southern boundary and the weighbridge is located in the yard to the east of the waste buildings.

2.2.4 The site contains a weighbridge, the provision of four portable units to provide office and mess accommodation, parking for staff and visitors and overnight lorry parking (as required). The site has fixed external lighting for safety and security. All lights are 150W Sodium Floodlights fitted with deflectors and angled downwards, as illustrated below. They are switched off outside operational hours.



2.2.5 The site currently has permeable and impermeable hard surface areas as shown on the approved drawing (GPP/GRA/BR/15/09) extract below.



2.2.6 The site has an approved drainage scheme which includes:

- Surface water to discharge via infiltration into the underlying strata.
- Rainwater from roof area will be collected by downpipes utilising a rainwater harvesting system. The harvested water is then used in general site processes.
- The proposed car parking spaces, located along the eastern boundary discharge via permeable paving into the underlying strata.
- The HGV parking on site is tarmacked and positively drained via gullies. The water is treated on site through an oil interceptor and discharged via soakaway. The oil interceptors also treat the surface water generated from the weighbridge
- Two bunded concreted areas have been constructed. One in the area where the inert waste processing will be undertaken. The second is utilised for the storage of sorted mixed wastes in containers. Any runoff from these areas is collected and stored within the bund until it is transported offsite for treatment.
- Foul drainage is connected to the existing septic tank on site.

## 2.3 Description of Proposed Development

2.3.1 The description of development is proposed to be as follows:

*“Regularisation, consolidation and extension to the existing waste transfer facility including an increase in throughput of waste”.*

## 2.4 Proposed Site Layout

2.4.1 It is proposed that the Site is laid out as shown on drawing ‘Site Layout Plan’ reference GPP/GRA/BR/EXT22/02 Rev 15. The general layout and operation of the Site will be similar to that approved under planning permission reference WSCC/036/14/BE (see decision notice enclosed at Appendix 1).

2.4.2 Essentially, the proposed extension area will enable the Applicant to create more room for the recycling of inert material which makes up approximately 75-80% of the throughput of material on annual basis. The recycling of the inert waste materials will be located towards the northern part of the proposed extension, further away from nearby sensitive receptors, thereby minimising any potential amenity issues (i.e. noise and dust).

## 2.5 Proposed Development

### Overview

- 2.5.1 The general method of recycling Construction and Demolition (C&D) waste and Commercial and Industrial (C&I) waste within the site, and the proposed extension area, will remain the same. There is no change to type of waste materials to be handled on site. The site currently has planning permission for a throughput of 30,000 tonnes of waste a year. This proposal seeks planning permission to increase that to 75,000 tonnes per year.

### Elevations / Appearance of Main Buildings

- 2.5.2 The existing buildings on site will continue to be used for the sorting, recycling and storage of the various waste streams as shown on the proposed Site Layout Plan GPP/GRA/BR/EXT22/02 Rev 15. Since being approved in 2014 for a waste management use, the existing buildings on site have been the subject of minor external changes (e.g. slightly wider door openings, roller shutter doors). In order to regularise this matter, elevations of the existing buildings/structures are shown on drawing GPP/GRA/BR/EXT22/05 Rev 01.

### Waste Sorting & Recycling Operations

- 2.5.3 Waste materials will be brought to the site via the entrance barrier, where initial checks are carried out (i.e. visual check for waste types, waste carrier reg etc). Once accepted, they are directed to the weighbridge, or directly to the appropriate tipping area.
- 2.5.4 On the weighbridge, another check is undertaken to confirm acceptance of the waste streams, and the necessary paperwork is completed. From the weighbridge, depending on the waste type, they will be directed to either the inert tipping area (to the east of the site), or for 'active' waste round to the western side of the site.
- 2.5.5 Clean inert Waste (soil and stone / hardcore) is screened, crushed and graded into secondary aggregates, in accordance with WRAP protocols in the eastern part of the site. The technical specification of the crusher and screener that is used on site is enclosed in the Structures Schedule at Appendix 2 to this statement.
- 2.5.6 The site will have two main tipping areas for mixed waste. Firstly, the main tipping shed, and secondly, the secondary tipping shed for waste that is easily segregated, or that may primarily be destined for landfill (non recyclates) therefore not going through the picking station.
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- 2.5.7 In the main tipping shed, the bulkier waste is sorted by a machine, with the remaining then loaded into hopper for further sorting on the picking line.
- 2.5.8 The covered secondary tipping area (known as the RoRo shed - see photograph below) has been installed over the space between the existing buildings. This provides a covered/sheltered area for tipping and segregation. The secondary tipping area contains the picking line bays which enables material to be sorted directly into the bays, before being moved to a collection bay specific to that waste stream. Here, operatives can partially segregate a load, before moving the remaining smaller waste to the main tipping shed where it goes through the picking line.
- 2.5.9 The covered secondary tipping area is approximately 18m long, 10m wide, with a height of 10m. It has been installed at this height to allow roro vehicles to safely tip, and to provide a secondary area for tipping as and when needed.



- 2.5.10 Tipping of single stream waste is carried out directly in front of the corresponding bay, to enable yard operatives to check the waste before moving into the specific bay. As the bays of segregated materials fill, onward disposal is undertaken of each waste stream, via the Applicant's own haulage, or by third party hauliers.

### **Aggregate Bay Storage**

- 2.5.11 Permission is also sought for the storage of aggregate/soils (and wood waste) materials in concrete Lego block storage bays along the western boundary of the site as shown on the proposed Site Layout Plan GPP/GRA/BR/EXT22/02 Rev 15. Photographs of the concrete Lego block bays are shown below. Elevations of the proposed Lego block storage bays are shown on drawing GPP/GRA/BR/EXT22/04 Rev 01.



### Inert Waste Recycling Area

2.5.12 The proposed north easterly extension area will be used for the inert recycling of construction and demolition waste. It will contain a crusher/screen, stockpiles of recovered inert materials (stones/aggregate/soils etc) and the installation of a small picking line, which is primarily used to clean the soil and stone. Photographs of the existing small picking line, which will be re-located is shown below.



2.5.13 The use of the mobile plant (crusher and screener) will remain in the north/north eastern part of the site (a minimum of 90 metres from Elbridge Farm Cottages) and will be limited to the locations shown on the Site Layout Plan drawing GPP/GRA/BR/EXT22/02 Rev 15 to minimise noise and dust on residential receptors.

### Covered Green Waste Skip

2.5.14 A covered green waste skip will be located on the eastern boundary of the site to temporarily store small amounts of incidental (and non-conforming) green waste that has been mixed with occasional loads of skip waste. The temporary holding of green waste is removed from site frequently (every 1-2 days normally) so that there is no biological breakdown of that waste and therefore no odour issues arise. A typical photograph of the type of covered waste skip is shown below.



### **Additional & New Structures**

2.5.15 The following additional and new structures/buildings seek planning permission as part of this Planning Application. These are shown on the on the enclosed Site Layout Plan drawing GPP/GRA/BR/EXT22/02 Rev 15 as follows:

- Additional picking station structure
- Additional waste reception structure
- Additional storage bays and covering structures
- Additional covering structure over 'secondary waste reception' area
- Acoustic Fence north of Elbridge Farm Cottages (to achieve noise attenuation)
- Covered Green Waste Skip
- Entrance Barriers
- Dust cannon and associated water tank

2.5.16 The Structures Schedule enclosed at Appendix 2 to this statement sets out photographs (save the acoustic fence which is new) of the above elements with dimensions.

## **2.6 Hours of Operation**

2.6.1 The proposed operating hours will not change and will continue to be as follows in accordance with the existing planning permission:

- 0700 to 1800 weekdays
- 0800 to 1400 Saturdays
- No operations on Sundays and Bank Holidays

## 2.7 Proposed Main Site Offices

2.7.1 The site currently has portacabin type offices which are associated with the administrative functions of the facility. The Applicant proposes to remove those offices from site and utilise an existing building within the site as the main offices. There are no external works to the building required. The location of the offices is shown on the Site Layout Plan - GPP/GRA/BR/EXT22/02 Rev 15 and identified on the google earth image below edged yellow.



## 2.8 Site Office/Welfare/Portacabin Buildings

2.8.1 There are existing offices/welfare buildings permitted on the site as part of planning permission reference WSCC/036/14/BE. A portacabin weighbridge office (containing a WC) will be relocated and situated opposite the weighbridge as shown on the enclosed Site Layout Plan - GPP/GRA/BR/EXT22/02 Rev 15. There is an existing Site Office and Mess Room located near the entrance barrier (labelled 'Portable units' on the enclosed Site Layout Plan - GPP/GRA/BR/EXT22/02 Rev 15. The existing raised metal cabin (see photograph below) is proposed to be removed from site on the basis that this planning application is successful.

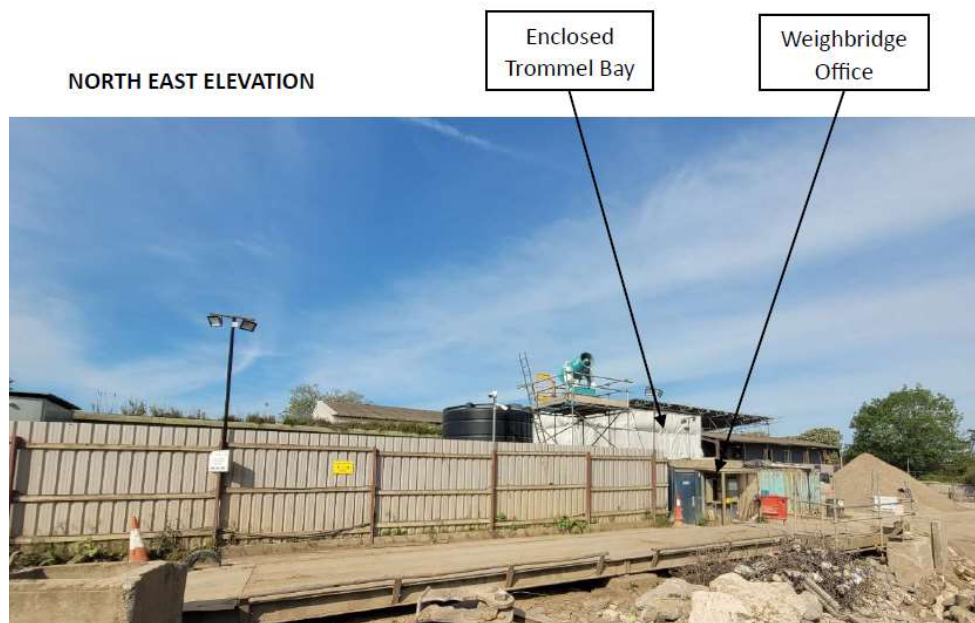


## 2.9 Internal Perimeter Concrete Wall & External Screening Bund

2.9.1 A 3.0-metre-high internal concrete wall will be constructed to contain the proposed operations. On the outer flanks, a perimeter landscaping screening bund will be constructed as shown on the Site Layout Plan - GPP/GRA/BR/EXT22/02 Rev 15. The screening bund will be grass seeded on the external batter and have native tree and shrub planting on its external slopes to minimise the landscape and visual impacts of the proposed extension area.

## 2.10 Weighbridge & Weighbridge Office

2.10.1 The existing weighbridge and weighbridge office (see photograph below) as shown on the Site Layout Plan - GPP/GRA/BR/EXT22/02 Rev 15 will be retained. Elevations of the weighbridge office are shown on drawing GPP/GRA/BR/14/05 Rev 01.



## 2.11 Proposed Perimeter Security Fencing

2.11.1 A 2-metre-high green mesh wire security fence will be located around the perimeter of the proposed extension area as shown as shown on the enclosed Site Layout Plan - GPP/GRA/BR/EXT22/02 Rev 15. An illustrative photograph of the type of proposed security fence is shown below.





## 2.12 Access, Widening & Surfacing of Internal Haul Road

- 2.12.1 The site has an established priority junction arrangement with an unnamed local internal access road which forms a junction with the A259 Bognor Road. The access road provides access to Elbridge Farm Business Park and two semi-detached properties which are located to the southern boundary of the business park site.
- 2.12.2 It is proposed that the access road on the Bognor Road (A259) is subject to local widening to reduce mud being deposited onto the road surface. The minor road widening works are shown on Figure 5.6 to the Transport Statement.
- 2.12.3 The internal access road is currently a loose bound hardcore surface which is difficult to maintain and keep clean. It is proposed to re-surface the internal access from the A259 Bognor Road with a tarmacadam surface, which enable the Applicant to prevent mud on the road and avoid potholes being created which gives rise to chains clanging on skip vehicles creating noise. The road surface along the service road close to the access is part of the WSCC highway network and is in poor condition.

## 2.13 Vehicle Movements

- 2.13.1 The majority of operational vehicles using the site are part of the Recycle Southern fleet with occasional visiting third party commercial vehicles. The operational vehicles typically visiting the site are:
- Recycle Southern Vehicles;
  - 11m rigid HGV Rolonof Vehicle (Skip compactor);
  - 10m rigid HGV grab lorry for waste and aggregate deliveries; and
  - 7.1m rigid HGV for Skip deliveries.

### **Internal HGV circulation**

2.13.2 HGVs movements will involve a one-way circulation system (in an anti-clockwise direction). Vehicle manoeuvrability within the site is demonstrated on drawings 2003024-TK03 (10 metre rigid tipper), 2003024-TK04 (10 metre rigid tipper), and 2003024-TK05 (16.5 metre articulated lorry), which are set out in the Transport Statement – Appendix 6 to this statement).

### **Left out only**

2.13.3 The Applicant acknowledges that right turning traffic at junctions creates conflicts between passing vehicle movements. All HGV drivers leaving the site access onto the A259 Chichester Road are therefore instructed and directed to undertake left turn movements only. This can be controlled by the imposition of a Planning Condition on the basis planning permission is granted.

### **Existing Permitted HGV Movements**

2.13.4 Based on the site processing the permitted 30,000 tonnes of waste per annum, the site generates approximately 30 incoming loads and 30 outgoing loads per day comprising 24 skip lorries and 6 HGVs. The approximate total is therefore 60 HGV movements per day worked out as an average.

### **Proposed Increase in HGV Movements**

2.13.5 On the basis that the applicant increases the throughput of waste to 75,000 tonnes per annum, it is anticipated that there will be approximately 75 incoming loads and 75 outgoing loads per day comprising 60 skip lorries and 15 four-axled tippers per day. This equates to an approximate total of 150 HGV movements per day.

2.13.6 There are also third-party Light Goods Vans (small builders/landscapers) for the delivery of rubble & waste for recycling or the collection of materials (aggregates etc).

## **2.14 Cycle Priority**

2.14.1 As part of the G119 Safety Audit recommendations, the Applicant proposes to include clear signage and carriageway markings to identify the cycle route past the Elbridge Farm access. The purpose is to create a clear route for cyclists and to clarify that cyclists have priority over vehicles in and out of the Application Site. The details of the proposed cycle signage and priority markings are shown on drawing 2003024-GA-01 B.

## 2.15 Wheel Cleaning Facilities

2.15.1 Wheel cleaning facilities will be provided at the exit of the site as shown on the enclosed Site Layout drawing GPP/GRA/BR/EXT22/02 Rev 15. A brush and hose will be used to ensure that the wheels of vehicles are suitably clean before using the internal access road (which is proposed to be resurfaced with a hard bound material).

## 2.16 Employment

2.16.1 The Applicant currently employs 6 office staff, 6 manual workers and 13 HGV drivers. The HGV drivers are not based at the site. There are also occasional/casual temporary workers depending on the level of activity on site. The proposal would enable the Applicant to employ between 5-7 additional staff.

## 2.17 Car & HGV Parking

2.17.1 The Applicant employs a car sharing scheme for employees to minimise the number of cars arriving and departing from the site. Car (including visitor) parking and overnight HGV parking on the site is shown on drawing the Site Layout Plan - GPP/GRA/BR/EXT22/02 Rev 15 enclosed with this planning application. The operation of the recycling facility will only require the vehicles to be parked up overnight, other times the vehicles are either out collecting waste or in the yard loading/unloading waste. The new layout will allow for some 10 HGVs and 4 trailers to park up within the site for operational purposes

2.17.2 The estimated additional 14 car movements per day would be associated with say 7 additional staff working at the site. The informal nature of the existing car parking area close to the site access has capacity to accommodate 7 cars if demand requires.

## 2.18 Dust Cannon and Water Holding Tank

2.18.1 To minimise dust from the operation of the trommel (which is enclosed by sheeting and located adjacent to the weighbridge as shown on the Site Layout Plan reference GPP/GRA/BR/EXT22/02 Rev 15), the Applicant uses a water/mist cannon. Water for use in the mist cannon is supplied from an adjacent black holding tank which is approximately 5.25 metres high and 3 metres wide. The mist cannon and water tank are shown on the enclosed elevation drawing - reference GPP/GRA/BR/EXT22/05 Rev 01 and shown on the photograph below.



## 2.19 Lighting

- 2.19.1 A minimal approach to lighting is proposed to ensure lighting is kept to the minimum criteria to illuminate the task at the times which it is required (normally the darker winters months at the beginning and end of the day). Lighting will facilitate safe movement of pedestrians and vehicles and aid site security. Lighting will not be required outside of the existing/proposed hours of operation. All lights are 150W Sodium Floodlights fitted with deflectors and angled downwards.
- 2.19.2 The column mounted luminaires (less than 3 metres in height) are only intended for the lighting of the site access, internal site road and the unadopted footpaths / parking areas. The location of the proposed lighting is shown on drawing the Site Layout Plan - GPP/GRA/BR/EXT22/02 Rev 15 enclosed with this planning application.
- 2.19.3 Where luminaires are proposed to be installed close to the site boundary, the luminaires will be orientated away from the boundary to focus light into the proposed development to prevent the potential for obtrusive light to occur outside of the site boundary.

## 2.20 Flood Risk & Surface Water Drainage

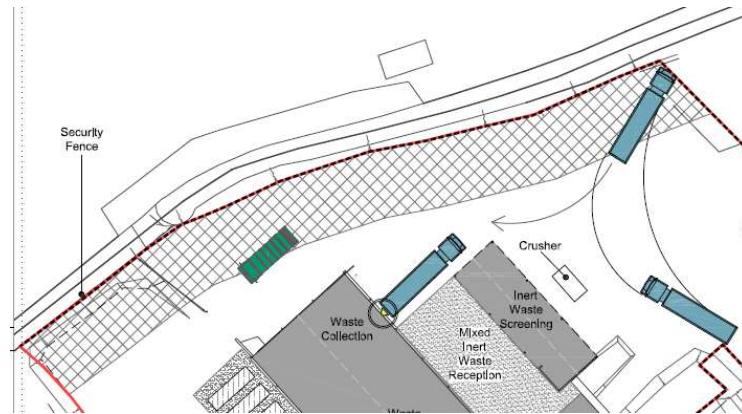
- 2.20.1 Existing roof and hardstanding areas are currently formally drained to an on-site surface water drainage system, which was installed at the inception of the site. Surface water run-off is conveyed by concrete drainage channels to buried chambers, followed by a series of treatment points: a collection chamber, an alarmed oil interceptor, then a holding tank (2 m in diameter and 3 m deep).
- 2.20.2 The collection chamber is emptied regularly by a suction tanker. Water is drawn from the holding tank and used for dust suppression on-site. Remaining water within the holding tank flows north-westwards

into a French drain along the western site boundary, which provides attenuation and filtration. The French drain flows north-eastwards, to a point where it discharges into the Elbridge Rife. A second collection chamber is located to the northwest of the Roll on Roll Off (Ro Ro) shed. This discharges to the French Drain, thence the watercourse.

- 2.20.3 A perimeter drain exists on the eastern site boundary (on the western side of the fence) comprising a 150 mm diameter geotextile-wrapped pipe, within a gravel filled trench. Water is conveyed within this drain north-westwards, where it connects to the western perimeter French drain. However, the granular nature of the sub-surface is such that it is considered highly likely that a large proportion of the water infiltrates directly to ground from the French drain.
- 2.20.4 All of the current inert recycling area is permeable and free-draining. The access road is impermeable but not formally drained.
- 2.20.5 Surface water within the existing site is currently managed within a drainage system, with water conveyed unrestricted to the Elbridge Rife watercourse. To ensure the drainage system will not increase the rate and volume of surface water run-off leaving the site, underground cellular storage is proposed, along with a new orifice plate which will restrict flows to 5 l/s. The InfoDrainage model anticipates some flooding on-site during the 1 in 100-year + climate change flood event, however the model does not consider water re-use on-site, or the storage and infiltration capacity of the filter drains. The proposed extension area is currently permeable and free-draining and will remain so post development. A swale is proposed along the inside of the screening bund, to encourage infiltration and provide water quality benefits.
- 2.20.6 The Flood Risk Assessment also updates and confirms the surface water arrangements on the site. In this regard, the report confirms that there are two bunded concrete pads which have sealed drainage systems which discharge to two sumps. The sumps are emptied as necessary and the water tankered off-site for treatment.

## **2.21 Stand-Off – Western Ditch**

- 2.21.1 The existing planning permission requires an 8 metre stand-off from the western ditch/watercourse due to concerns regarding flood risk. This area is shown hatched on the Approved Site Layout Plan below.



2.21.2 The more recent assessment of flood risk concludes that this area poses minimal flood risk issues for the waste management operations, therefore, this restriction is proposed to be removed as part of this Planning Application.

## 2.22 Landscape Planting

2.22.1 The outer face of the perimeter screening bund will be planted with native tree and shrub planting. The proposed landscape planting scheme will include the following and is shown on drawing 2414-TFC-00-00-DR-L-1001-P05 submitted with this Planning Application and contained within the Landscape Appraisal report (see Appendix 4 to this statement).

### Planting Schedule

#### Trees

Species	Girth	Height	Specification	Qty.
Acer campestre	12-14cm	2.0-2.5m	RB	1 No.
Prunus avium	12-14cm	2.0-2.5m	RB	1 No.

#### Native Shrubs

Abbreviation	Species	Height	Specification	Density	Coverage	Qty.
Acer_camp	Acer campestre	200-250cm	RB	1.5Ctr	5% Coverage	14 No.
Cory_avel	Corylus avellana	80-100cm	BR	1.5Ctr	20% Coverage	56 No.
Crat_mono	Crataegus monogyna	80-100cm	BR	1.5Ctr	25% Coverage	69 No.
Prun_spin	Prunus spinosa	80-100cm	BR	1.5Ctr	25% Coverage	69 No.
Sali_capr	Salix caprea	80-100cm	BR	1.5Ctr	15% Coverage	42 No.
Vibu_opul	Viburnum opulus	80-100cm	BR	1.5Ctr	10% Coverage	28 No.

### 3 PLANNING POLICY CONTEXT

#### 3.1 Introduction

3.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that the determination of a planning application must be made in accordance with the Development Plan unless material considerations indicate otherwise.

3.1.2 In this instance, the Development Plan consists of the following document:

- West Sussex Waste Local Plan
- Arun District Local Plan, and

3.1.3 The main policies within each document considered relevant to the proposal are set out below.

#### 3.2 The Development Plan

##### **West Sussex Waste Local Plan (2014)**

3.2.1 The West Sussex Waste Local Plan was adopted by West Sussex County Council (in partnership with South Downs National Park) in April 2014. The plan covers the period to 2031 and is the most up-to-date statement of land use planning policy for waste.

3.2.2 The 2014 Waste Local Plan was subject to a review in 2019 to see whether the Plan needed updating. The outcome of the review that was undertaken confirmed that the plan remains relevant and effective, therefore no update is required was required.

3.2.3 The following main policies of the adopted Waste Local Plan are relevant to the determination of this planning application:

- Policy W1: Need for Waste Management Policies
- Policy W3: Location of Built Waste Management Facilities
- Policy W4: Inert Waste Recycling
- Policy W11: Character
- Policy W12: High Quality Developments
- Policy W14: Biodiversity and Geodiversity
- Policy W15: Historic Environment
- Policy W16: Air, Soil, and Water

- Policy W17: Flooding
- Policy W18 (Transport)
- Policy W19 (Public health and amenity)
- Policy W21 (Cumulative Impact)
- Policy W23: Waste Management within Development

### **Arun District Local Plan**

3.2.4 The Arun Local Plan 2011-2031 was adopted by resolution of Full Council on 18th July 2018. The Plan sets out a spatial vision, objectives and a sustainable strategy for delivering the needed growth of the District over the period 2011- 2031. The Arun Local Plan 2018 is used to guide decisions on planning, development and regeneration activity over this period including many other decisions shaping corporate investment plans and strategies, as well as those from external providers, delivering services and infrastructure to the local community.

3.2.5 The following main policies of the adopted Local Plan are relevant to the determination of this planning application:

- Policy SD SP1 Sustainable development
- Policy C SP1 Countryside
- Policy LAN DM1 Protection of landscape character
- Policy SD SP3 Gaps Between Settlements
- Policy SO DM1 Soils
- Policy D SP1 Design
- Policy ECC SP1 Adapting to climate change
- Policy ENV SP1 Natural Environment
- Policy ENV DM5 Development and biodiversity
- Policy W SP1 Water
- Policy W DM1 Water supply and quality
- Policy W DM2 Flood risk
- Policy W DM3 Sustainable Urban Drainage Systems
- Policy WM DM1 Waste Management
- Policy QE SP1 Quality of the environment
- Policy QE DM1 Noise pollution
- Policy QE DM2 Light pollution



- Policy QE DM3 Air pollution
- Policy T SP1 Transport and Development
- Policy HER DM6 Sites of Archaeological Interest
- Policy HER SP1 The historic environment
- Policy HER DM6 Sites of Archaeological Interest

### **3.3 Other Relevant Documents**

3.3.1 The National Planning Practice Guide (NPPG) confirms that the National Planning Policy Framework (NPPF) represents up-to-date government planning policy and must be taken into account where it is relevant to a planning application.

3.3.2 The following documents are therefore considered to represent a material consideration in the determination of this planning application.

- National Planning Policy Framework, July 2021.
- National Planning Practice Guidance; and
- National Planning Policy for Waste

## 4 ASSESSMENT OF THE PROPOSAL

### 4.1 Introduction

4.1.1 From an assessment of the Development Plan and other relevant documents, the main issues in the assessment of the proposed development are as follows:

- Principle of Development;
- Alternatives;
- Strategic Gaps Between Settlements;
- Need;
- Employment & Economics, and
- Environmental and Local Amenity Considerations.

4.1.2 The following section considers the main planning issues in turn.

### 4.2 Principle of Development

4.2.1 The Applicant established planning permission in September 2014 for a ‘waste transfer and recycling facility’ at Elbridge Farm Business Centre. The Applicant’s business plays an important role in minimising waste disposal, increasing recycling and diverting waste from landfill.

4.2.2 Policy W3 (Location of Built Waste Management Facilities) of the Waste Local Plan states:

*(a) Proposals for built waste management facilities, on unallocated sites, to enable the transfer, recycling, and recovery of waste will be permitted provided that:*

*(i) it can be demonstrated that they cannot be delivered on permitted sites for built waste management facilities or on the sites allocated for that purpose in Policy W10; and*

*(ii) they are located in the Areas of Search along the coast and in the north and east of the County as identified on the Key Diagram;*

*or (iii) outside the Areas of Search identified on the Key Diagram, they are only small-scale facilities to serve a local need.*

4.2.3 In terms of point (i), the Applicant’s existing site is identified within the Waste Local Plan as a built waste management facility providing capacity for the transfer of waste. The proposal will act as an extension to the existing facility. The enclosed Alternative Site Assessment (see section 5.3 below) demonstrates that

the proposal cannot be delivered on permitted built waste management facilities or on the sites allocated for that purpose in Policy W10.

- 4.2.4 In terms of point (ii), the Site is located within an 'area of search' within the key diagram of the Waste Local Plan is therefore compliant with the spatial strategy aspirations of locating waste management facilities in the County.
- 4.2.5 The Applicant's proposal is therefore, in principle, compliant with the locational criteria of part a) of Policy W3 of the Waste Local Plan subject to the environmental and local amenity impacts being acceptable, the latter of which is dealt with in section 5.4 below.

## 4.3 Alternatives

### Introduction

- 4.3.1 Policy W3 (Location of Built Waste Management Facilities) of the adopted Waste Local Plan states that

*(b) Proposals that accord with part (a) must:... (iii) only be located on a greenfield site, if it can be demonstrated that no suitable alternative sites are available...*

- 4.3.2 The supporting text to Policy W3 states that "Greenfield sites should only be used if no other suitable sites are available. Applicants will be required to demonstrate that all alternatives have been fully investigated, appropriate to the scale and nature of the development. This includes consideration of existing, permitted, or allocated sites for built waste management uses; other sites within built-up areas; and previously developed land outside built-up areas."

- 4.3.3 Paragraph 6.1.12 of the Waste Local Plan confirms that:

*Existing waste sites are suitable, in principle, for the intensification of existing uses and the co-location of new built waste facilities. There may also be instances where land adjoining existing waste sites could be satisfactorily incorporated as part of proposals. In some cases, however, it may not be appropriate to locate new built facilities at sites that are operating under a temporary consent or at sites in the countryside. There may also be cases where the existing waste use is inappropriately located and should not be perpetuated. Any proposal for an extension beyond the boundary of an existing site will be treated as a new site.*

*6.4.13 Industrial areas, especially those containing heavy or specialised uses, are suitable locations for waste management facilities as waste sorting, transfer, recycling, and treatment*

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*operations are similar to industrial processes and they require similar buildings and infrastructure.*

- 4.3.4 In accordance with Policy W3, the Applicant has prepared an Alternative Site Assessment (ASA), which is enclosed at Appendix 3 to this statement.
- 4.3.5 The ASA has assessed all relevant available information in the exercise of identifying any reasonable alternative site(s). Despite the comprehensive review of the information only 5 sites have been identified as having any potential. Of these, four are considered to have limited suitability, with the other having potential, but with issues.
- 4.3.6 What the ASA has shown is that it is difficult to find a waste site that is suitable for the proposed use. All five of the “potential” sites have issue/problems, which may not be resolvable in the short term.
- 4.3.7 The ASA concludes that, if the current site is allowed to expand, it would clearly be the best site when compared to the 5 potential sites identified through the ASA. The proposed development is therefore considered to represent a good alternative and there is no reasonable suitable alternative site within the search area. The proposal is therefore compliant with Policy W3 of the Waste Local Plan.

## **4.4 Strategic Gaps Between Settlements**

- 4.4.1 Policy W11 (Character) of the Waste Local Plan states that proposals for waste development will be permitted provided that they would not have an unacceptable impact on:

*“(b) the separate identity of settlements and distinctive character of towns and villages (including specific areas or neighbourhoods) and development would not lead to their actual or perceived coalescence.”*

- 4.4.2 Policy SD SP3 (Gaps Between Settlements) of the Arun District Local Plan states that:

*“The generally open and undeveloped nature of the following gaps between settlements, as identified on the Policies Maps will be protected to prevent coalescence and retain their separate identity:*

*Development will only be permitted within the gaps if:*

- a. It would not undermine the physical and/or visual separation of settlements;*
- b. It would not compromise the integrity of the gap, either individually or cumulatively with other existing or proposed development;*
- c. It cannot be located elsewhere; and*

*d. It maintains the character of the undeveloped coast;*

*e. or, if a subsequent DPD or Neighbourhood Plan deems it appropriate through an allocation.”*

- 4.4.3 The Application Site is identified with a red dot below on the proposals map extract which confirms it is situated with the ‘Bognor Regis to Chichester’ settlement gap.



- 4.4.4 The supporting text to Policy SD SP3 at paragraph 7.4.5 of the Local Plan states that:

*“The designation of gaps is not intended to rule out all development but to allow for appropriate, small scale development, which is in keeping with the rural nature of the gaps. Development in the gaps must be appropriately sited and designed to minimise the impact on the openness of the gap, it would also be subject to other policies within the Local Plan.”*

- 4.4.5 In terms of criterion a) and b), the Applicant’s existing facility is located off the A429 approximately 600 metres north of North Bersted as shown below.



- 4.4.6 The proposal involves an extension to an existing waste management facility in a rural area between Bognor Regis and Chichester. Due to the relatively small size of the proposed extension area within the gap between Bognor Regis and Chichester, the proposal will not have a harmful urbanisation of the local rural environment or undermine the physical and visual separation of the settlements. The proposal will not therefore bring a physical or perceived coalescence of the two settlements. No adverse harm to the landscape character, appearance and function of this part of the settlement gap will arise.
- 4.4.7 There are no known planned or permitted development proposals within the settlement gap that would aggregate with the proposal to give rise to unacceptable individual or cumulative impacts upon the integrity of the gap in compliance with part b) of Policy SD SP3.
- 4.4.8 In terms of criterion c), section 5.3 of this statement confirms that the proposal is a compliant with the Waste Spatial Strategy and cannot reasonably be located elsewhere.
- 4.4.9 In terms of criterion d), the proposal will not have a detrimental impact upon the character of the undeveloped coast. The proposal will provide a small extension to the existing waste and commercial related uses at the former Elbridge Farm located off the strategic highway.
- 4.4.10 Part e) of the policy is irrelevant in this case.
- 4.4.11 The Landscape Appraisal at paragraph 7.3 agrees with this analysis and concludes:

*Although the Site lies within Bognor Regis to Chichester Gap, as set out in Policy SD SP3 Gaps Between Settlements in the Arun Local Plan and adjoins options 1 and 2 for the potential location of the Bognor and Chichester gap within Chichester District, it is not considered that the proposed development will result in a significant adverse effect on either the integrity of the gap or the physical and / or visual separation or coalescence of settlements. As described above, the site extension will not include any new buildings, comprising only waste transfer operations comparable to those currently being carried out on the site. Proposed bunding and native planting will help to integrate the proposed development, as well as the existing site and buildings into the wider landscape.*

- 4.4.12 In overall terms, the proposal is compliant with the aspirations of Policy W11 and Policy SD SP3 by being small scale development, which is in keeping with the rural nature of the gaps. The proposal has been appropriately sited and designed to minimise the impact on the openness of the Bognor Regis to Chichester' settlement gap. The proposal will not undermine the physical and visual separation of the settlements.

## 4.5 Need

### Planning Policy Background

- 4.5.1 Policy W1 of the 2014 Waste Local Plan sets out the requirements to demonstrate need for a new facility (or in this case an extension to a non-allocated site). There are six categories of waste management listed in the policy as (a) to (f).
- 4.5.2 However, the operations and the types of waste managed at the site makes it difficult to “fit” the proposal directly into one single category. The 2 main operations are transfer of mixed waste and recycling of inert wastes. For this reason, it is considered that the Site falls within both category (a) and category (c).
- 4.5.3 At the time of the publication of the WLP there was no shortfall of capacity for inert recycling. Hence no specific figure is quoted in part c of Policy W1. Also, the 140,000-tonne deficit in part a is now out of date.
- 4.5.4 The WLP Review (May 2019) identified that, since adoption of the Plan in April 2014, there have been no substantive changes in national or local circumstances, and the policies have generally performed as expected. The Review concluded that the policies are still considered to be consistent with national policy, relevant and effective, and working to achieve the vision and strategic objectives of the Plan.
- 4.5.5 The WLP Review indicated that there was no quantitative need for C&D Recycling or waste transfer.
- 4.5.6 This position is reiterated in the West Sussex Joint Minerals Local Plan and Waste Local Plan: Monitoring Report 2020/21 (AMR). Table 10 of AMR as reproduced below.

Table 10: Waste Site Capacities (2020/21)

Waste Site	(A) Current 'need' over Plan period until 2031 (tpa)	(B) Capacities: Operational (tpa)	(C) Capacities: Not Operational (tpa)	(D) Total Capacity (tpa) (B) + (C) = (D)	(E) Shortfalls: Capacity still required Operational sites only (A) - (B) = (E)	(F) Shortfalls: Capacity still required Total Capacity (A) - (D) = F
<b>All Transfer Capacity</b> (HWRS, Mobile Transfer Sites, Merchant Transfer Stations, Clinical Transfer Stations)	1,309,725	1,355,996 <sup>28</sup>	0	1,355,996	-46,271	-46,271
<b>Non-inert Recycling and Composting (MSW and C&amp;I)<sup>29</sup></b> (OWC, IVC, MRF, Contribution to recycling from transfer sites, Metal Recycling)	720,253	713,864	50,000	763,864	6,389	-43,611
<b>CD&amp;E Recycling (aggregate recycling)</b> (Dedicated C&D/Inert recycling sites and Waste Transfer Sites where recycling takes place)	N/A	583,000	30,000	613,000	N/A	N/A
<b>Non-inert Waste Recovery (MSW and C&amp;I)<sup>30</sup></b> (MBT, EFW/Thermal Treatment)	853,000 <sup>31</sup>	402,000	320,000	722,000	451,000	131,000
<b>Inert recovery (annual capacity)<sup>32</sup></b>		678,000		678,000	N/A	N/A
<b>Inert Landfill</b>		0	0	0	N/A	N/A
<b>Non-inert landfill capacity</b>		0	0	0	605,000	605,000

Note: The 230,000tpa Waste Transfer Station at the Former Wealden Brickworks, Langhurstwood Road, Horsham (WSCC/018/14) is included under column B for 'All Transfer Capacity' and 'Non-inert Recycling and Composting (MSW and C&I)' to account for the contribution it makes to recycling capacity in West Sussex. The capacity for the MRF and EFW from the recycling, recovery and renewable energy facility allowed on appeal in February 2020 (WSCC/015/18) is included under column C for 'Non-inert Recycling and Composting (MSW and C&I)' and 'Non-inert Waste Recovery (MSW and C&I)' and will supersede (WSCC/018/14) if it is implemented.

### Transfer Capacity - Horsham Site

4.5.7 The AMR refers to the Former Wealden Brickworks, at Langhurstwood Road in Horsham, which was granted permission on appeal for an Energy from Waste plant:

*“If the recycling, recovery and renewable energy facility allowed on appeal in February 2020 at the Former Wealden Brickworks, Langhurstwood Road, Horsham (WSCC/015/18/NH) is implemented, this will supersede the transfer capacity that is currently operational at the site. This may result in a shortfall as there would be a 180,000tpa net loss in transfer capacity”.*

4.5.8 It is understood that the aforementioned facility is now under construction. As inferred in the AMR, once operational, this would reduce overall waste transfer capacity in the County by up to 180,000 tonnes per annum. Therefore, using the data from Table 10 in the AMR, Table 1 below updates the Waste Transfer capacity requirement.

	Current Need	Operational Capacities	Non-operational capacity	Total Capacity	Shortfalls - operational	Net Capacity required
<b>All transfer</b>	1309725	1355996	0	1355996	-46271	-46271
<b>Less Horsham site</b>	1309725	1175996	0	1175996	133729	133729
<i>with RSL</i>	1309725	1199396	0	1199396	<b>110329</b>	<b>110329</b>

**Table 1: Revised capacity calculation showing loss of 180,000 tonne WTS capacity**

4.5.9 The Table shows that there would be a requirement for 133,729 tonnes of WTS capacity following the loss of the Horsham site.

4.5.10 The waste management activities at the Application site comprise approximately 52% transfer and 48% recycling of inert wastes. Given that the proposal is for a 45,000 tonne *increase* over and above that already permitted, the actual transfer element would be in the order of 23,400 tonnes. If the current proposal is approved, then this would reduce the need and net WTS capacity to around 110,000 tonnes.

4.5.11 The proposal would therefore make a significant contribution to reducing the resultant need for additional WTS capacity over the plan period.



## Landfill Diversion

- 4.5.12 The throughput and landfill diversion rates at the site are compiled quarterly, in conjunction with Environment Agency returns.
- 4.5.13 All material received is processed by means of manual or mechanical separation and, once segregated, is either recycled on site or transferred to alternative licenced facilities for further processing or direct recycling/recovery – including energy from waste. Certain materials are not suitable for this, and as a last resort, would be disposed of directly at landfill.
- 4.5.14 The following table (Table 2) shows the waste types diverted from landfill from the quarter ending September 2020 through to March 2022.

**Table 2: Landfill Diversion**

Waste Type	Sep-20	Dec-20	Mar-21	Jun-21	Sep-21	Dec-21	Mar-22
green	17.62	58.62	41.3	40.08	60.36	29.3	34.62
plasterboard	365.06	281.12	309.28	234.18	234.52	242.4	380.14
plastics	91.06	48.03	13.66	30.8	41.07	23.98	13.22
wood	2590.9	1539.82	1700.22	1505.01	1195.47	1068.43	1078.26
cardboard	107.52	26.96	51.86	49.55	43.29	42.37	50.09
metals	484.4	249.65	181.53	191.08	203.436	144.97	174.31
mixed	1718.5	1063.26	945.98	1069.01	1209.9	950.52	795.13
residual	153.6	138.36	200.4	162.88	198.94	153.1	188.52
tyres	3.29	4.78	2.32	1.13	3.22	1.45	2.61
clay/muck/soils	6039.4	4748.8	5976.28	5535.32	5372	5134.64	5861
textiles	1.12	0	0	0	0	0	0
hazardous	5.865	6.23	5.75	1.375	3.84	2.1	5.26
<b>totals</b>	<b>11578.3</b>	<b>8165.6</b>	<b>9428.6</b>	<b>8820.42</b>	<b>8566.05</b>	<b>7793.26</b>	<b>8583.16</b>

- 4.5.15 The total waste managed was 62,935 tonnes. In addition, over the same period the Site recycled inert waste to produce 58,435 tonnes of varying grades of recycled aggregate.
- 4.5.16 Therefore, over the period from July 2020 to March 2022, 121,370 tonnes of waste was diverted from landfill. This helps to meet the general aim of the WPA to achieve zero waste to landfill by 2031 (paragraph 2.10.13) and also meets the policy requirement of the National Planning Policy for Waste of driving waste management up the waste hierarchy (paragraph 1).
- 4.5.17 The residual waste sent to landfill (excluding inert material) equates to around 1% of the total input over the period.

## Market Need

4.5.18 Waste transport does not stop at the county boundaries as is pointed out in the AMR:

*“Waste travels beyond administrative boundaries and is managed based on commercial decisions.*

4.5.19 It goes on to explain that:

*“The South East Waste Planning Advisory Group (SEWPAG), have signed up to a Memorandum of Understanding, which sets out that the authorities will all plan for net self-sufficiency, allowing for waste to continue to move as required, whilst all plan areas provide sufficient capacity for waste arisings”.*

4.5.20 Notwithstanding the above, over the period January 2019 to March 2022, 86% of the waste managed at the application site originated in West Sussex. A further 13% originated in the adjoining authorities of East Sussex, Hampshire and Surrey, which would take the total *local* market throughput to nearly 100%

4.5.21 Therefore, in terms of Policy W1, the proposal meets the general aim of part (a) as it will contribute to the capacity void left by the loss of the Horsham waste transfer facility. It will also meet the requirements of part (c) as the recycling of inert waste is catering for a local market need and is consistent with the principle of net self-sufficiency.

## Conclusion - Need

4.5.22 In conclusion, it is considered that the proposed increase in throughput at the Site complies with WLP Policy W1 and the National Policy for Waste.

## 4.6 Employment & Economics

4.6.1 The NPPF and local planning policies support economic growth and the development of businesses in rural areas. The proposal represents a significant financial investment into the development of the existing waste management facility. The growth of the company, including the sustainable benefits of increased recycling in the area are important considerations in the determination of this Planning Application.

4.6.2 The proposed development will generate 5-7 full time jobs together wider indirect and induced employment. As well as direct employment, the proposed development will create indirect and induced employment opportunities as a consequence of how the supply chains operate.

- 4.6.3 The economic and employment benefits of the proposed development are matters to which significant weight should be attached in the planning balance. The proposed development will therefore comply with the aspirations of the NPPF and the Development Plan by supporting economic growth and the development of businesses in rural areas.

## 5 ENVIRONMENTAL & LOCAL AMENITY ISSUES

### 5.1 Introduction

5.1.1 From an assessment of the Development and other relevant planning policy documents, the following environmental and local amenity related topics are assessed in turn below:

- Landscape & Visual impact
- Ecology and Ecological Enhancement
- Traffic & Transportation
- Noise
- Dust
- Flood Risk & Surface Water Drainage
- Historic Environment
- Soils

### 5.2 Landscape & Visual Impact

5.2.1 Relevant policies within the Arun Local Plan, include Policies SD SP3 (Gaps Between Settlements) and Policy LAN DM1 (Protection of Landscape Character). Policy SD SP3 identifies the site within the Bognor Regis to Chichester Gap. Policy LAN DM1 states

*that development throughout the plan area should respect the particular characteristics and natural features of the relevant landscape character areas and seek, wherever possible, to reinforce or repair the character of those areas...*

5.2.2 Policy W11 (Landscape Character) of the West Sussex Waste Local Plan, states that proposals for waste development will be permitted provided that they would not have an unacceptable impact on: the character, distinctiveness, and sense of place of the different areas of the County and that they reflect and, where possible, reinforce the character of the main natural character areas (including the retention of important features or characteristics); and, the separate identity of settlements and distinctive character of towns and villages (including specific areas or neighbourhoods) and development would not lead to their actual or perceived coalescence.

5.2.3 Policy LAN DM1 (Protection of landscape character) of the Arun Local Plan which provides that development throughout the plan area should respect the particular characteristics and natural features

of the relevant landscape character areas and seek, wherever possible, to reinforce or repair the character of those areas.

5.2.4 The Landscape Gap Assessment for Chichester District Council was produced in May 2019. The guidelines state, amongst other recommendations: -

*‘Any proposed development should not visually, perceptually or physically lead to coalescence of settlements’; -*

*‘Ensure any new development, including horticultural development, is well integrated into the wider landscape. Use locally appropriate and characteristic hedgerow and treeline planting as appropriate’ –*

*‘Ensure the positive open views to the SDNP and identified landmarks are retained’*

5.2.5 This Planning Application is accompanied by a Landscape and Visual Study (L&VS) and is enclosed at Appendix 4 to this statement. The L&VS does not represent a full Landscape and Visual Impact Appraisal (LVIA) but is based on the approach set out in the Guidelines for Landscape and Visual Impact Assessments 3rd edition (GLVIA 3) which also states that any appraisal should be ‘proportional to the scale and nature of the proposed development’ (GLVIA3 para. 6.2).

5.2.6 The report notes that there are no landscape related designations within 1 kilometre of the site. There are no public rights of way crossing the site, or in its immediate vicinity. Public footpath number 200 crosses farmland to the north of the site, following the line of an old canal, between the A259, Colworth and Lidsey.

5.2.7 The site is assessed as having a relatively low landscape sensitivity, due to the presence of the existing waste transfer facility at Elbridge Farm Business Park, along with a number of urban influences in the surrounding landscape. The proposed development will not include any new buildings, comprising only waste transfer operations including tipping, processing, and storage of stock, along with the exterior earth bunding, security fencing and planting within the site extension. As a result, there will be limited adverse landscape effects due to the proposed development.

5.2.8 The zone of theoretical visibility (ZTV) confirms that, in visual sensitivity terms, publicly accessible views are largely confined to those gained from the A259 as it passes Elbridge Farm, with occasional glimpses possible from surrounding roads and footpaths. Views are limited by the lack of public rights of way in the immediate vicinity of the site. This assessment was undertaken in autumn when trees were partially in leaf demonstrating their near full screening potential. The low-lying landscape of the coastal plain

surrounding the site, results in many of the locations indicated as ‘development potentially visible’ being restricted by intervening vegetation and built form, including horticultural glasshouses and polytunnels.

- 5.2.9 Opportunities to view the proposed development from publicly accessible vantagepoints will be limited due to surrounding mature vegetation and built form, and a lack of public rights of way in the vicinity of the site. Where public or private views are possible, the proposals will be seen in the context of the existing waste transfer station, with proposed perimeter earth bunding and native tree and shrub planting on the south-eastern boundary partially restricting views to the proposed development, as well as the existing site. Existing trees and hedgerow on the southwestern boundary with Elbridge Cottages will be retained and strengthened with additional planting to provide further screening. There will therefore be no significant public views of the proposed development.
- 5.2.10 The L&VS notes that although the site lies within the Bognor Regis to Chichester Gap, it is not considered that the proposed site extension will result in an appreciable adverse effect on either the integrity of the gap, or the physical and / or visual separation of settlements. Similarly, in relation to options 1 and 2 for the potential location of the Bognor and Chichester gap within Chichester District, it is considered that the proposed development will not visually, perceptually or physically lead to coalescence of settlements, and will be well integrated into the wider landscape, using locally appropriate and characteristic tree and shrub planting.
- 5.2.11 The Landscape Management Guidelines for LCA SC9: Chichester to Yapton Coastal Plain as identified in the West Sussex Landscape Character Assessment include: ‘Maintain and strengthen field boundaries such as hedgerows and shelterbelts’; and ‘Encourage bold tree planting associated with large agricultural buildings, glasshouses and industrial buildings to attempt to assimilate them into the landscape more satisfactorily’. Proposed bunding and associated native tree and shrub planting on the eastern site boundaries attempts to address these recommendations. The proposed landscape mitigation measures, shown on drawing 2414-TFC-00-00-DR-L-1001-P05, will therefore ensure that any negative impacts are minimised.
- 5.2.12 Having regard to the findings of the L&AS., it is concluded that the proposal will not conflict with the aspirations of Policies SD SP3 and Policy LAN DM1 of the Arun Local Plan or Policy W11 of the Waste Local Plan.

### 5.3 Ecology & Ecological Enhancement

5.3.1 Policy W14 (Biodiversity and Geodiversity) of the Waste Local Plan states that proposals for waste development will be permitted provided that (inter alia) there are no adverse impacts upon features of ecological interest. Where appropriate, the creation, enhancement, and management of habitats, ecological networks, and ecosystem services is secured. Chapter 15 of the NPPF has similar policy requirements.

5.3.2 Policy ENV SP1 (Natural Environment) of the Arun Local Plan seeks to encourage and promote the preservation, restoration and enhancement of biodiversity and the natural environment through the development process and particularly through policies for the protection of both designated and non-designated sites. Where possible it shall also promote the creation of new areas for habitats and species.

5.3.3 Policy ENV DM5 (Development and Biodiversity) of the Arun Local Plan states that:

*“Development schemes shall, in the first instance, seek to achieve a net gain in biodiversity and protect existing habitats on site. They shall also however incorporate elements of biodiversity including green walls, roofs, bat and bird boxes as well as landscape features minimising adverse impacts on existing habitats (whether designated or not). Development schemes shall also be appropriately designed to facilitate the emergence of new habitats through the creation of links between habitat areas and open spaces. Together, these provide a network of green spaces which serve to reconnect isolated sites and facilitate species movement.”*

5.3.4 An Ecological Assessment report (see Appendix 5 to this statement) has been prepared to evaluate the habitat value of the site and its potential to support EU and UK protected/notable species. The purpose of the report is to record the findings of the survey and identify potential ecological constraints and opportunities in relation to a proposal, which will include the extension of the existing materials recycling facility and waste transfer station to the east, along with the construction of an internal concrete wall with an external perimeter soil bund for screening purposes and modifications to the existing site, including the creation of a car park on existing hardstanding along the western boundary and internal conversion of a storage building to new offices.

5.3.5 The new extension area comprises an agricultural field that is currently unsown set-aside, bordered by areas of scrub, nettle beds and longer grassy margins. A ditch forms the northern boundary which is designated as a Statutory Main River by the Environment Agency. The banks of the ditch along the

boundary of the existing recycling centre are formed of native hedgerow and the area bordering the ditch in the new extension zone comprises shortly mown grassland. An oak treeline is located on the other side of the bank, outside of the Planning Application boundary. Agricultural and horticultural land dominates the wider area, with fields of glasshouses and arable land present within the wider landscape.

- 5.3.6 The proposal is small in scale and situated outside the zone of influence of all designated sites. As a result, there are no identified mechanisms of impact on designated sites from the proposed development. All works, including the creation of the external soil bund and replacement of existing security fencing, will follow pollution prevention guidelines to protect the ditch from sedimentation and runoff.
- 5.3.7 A 2m high security fence will also be positioned to run along the outside face of the bund. The external security fencing along the eastern and southern boundaries lying adjacent to the bund will contain small holes at the base of the fence to allow wildlife to access the habitat on the bund.
- 5.3.8 The Ecological Assessment concludes that the proposed development will not impact upon any protected or notable species. Precautionary mitigation will, however, include the following measures:
- bats during the installation of any new external lighting around the site
  - breeding birds during site clearance and construction
  - dormice during any scrub removal and fence replacement works
  - hedgehogs, reptiles and amphibians during removal of longer vegetation, topsoil removal and the fence replacement works.
- 5.3.9 The installation of nest boxes, described in section 5 of the Ecological Assessment report, will result in new opportunities for nesting birds, and likely beneficial effects for biodiversity. It is also recommended that two 1ZA Schwegler Wren Roundhouse (or similar) nest boxes are installed upon larger shrubs within the retained scrub in the southern corner. These will be placed at a height of between 1.5-3m in a shady spot, sited in undergrowth to provide cover for the nest.
- 5.3.10 The proposed extension to the existing waste management site does not lend itself to much opportunity to provide features of ecological enhancement given the constraints of the site and land available. The proposed development does though provide an opportunity for habitat enhancement to benefit insects, birds, and bats. The planting scheme will include native shrub species and flowering species known to encourage insect diversity. The proposed enhancement measures will result in beneficial effects for biodiversity at the Site on the basis that this Planning Application is successful.



5.3.11 Having regard to the findings of the Ecological Assessment report, with the implementation of appropriate mitigation measures, which can be secured by the imposition of planning conditions, the proposed development will not result in an unacceptable impact upon features of nature conservation interest. The proposed enhancement measures will encourage biodiversity and comply with the policy aspirations of Policy ENV DM5 of the Arun Local Plan and the NPPF. It therefore concluded that the proposal complies with Policy ENV SP1 of the Local Plan and Policy W14 of the Waste Local Plan.

## 5.4 Traffic and Transportation

5.4.1 Policy 18 of the Waste Local Plan provides that proposals for waste development will be permitted provided that vehicle movements associated with the development will not have an unacceptable impact on the capacity of the highway network and the materials are capable of being transported using the Lorry Route Network with minimal use of local roads. It also requires that there is safe and adequate means of access to the highway network and satisfactory provision is made for vehicle turning and parking, manoeuvring, and loading/unloading. Policy T SP1 Transport and Development of the Arun Local Plan has similar planning policy requirements.

5.4.2 The West Sussex Transport Plan 2022-2036 (WSTP) was adopted April 2022. The WSTP sets out the strategies that guide WSCC's approach to maintaining, managing and investing in transport. It has an overall vision to achieve efficient, safe and less congested transport networks. The Council's long-term strategy towards freight movements is set out within Section of the WSTP where it is acknowledged that the efficient and safe movement of freight is vital to the success and growth of the West Sussex economy.

5.4.3 Paragraph 111 of the NPPF states that:

*“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe”.*

5.4.4 A Transport Assessment accompanies this Planning Application and is enclosed at Appendix 6 to this report. The report reviews Personal Injury Accident information and assesses the suitability of the existing access to accommodate the proposed vehicle flows.

5.4.5 In summary since 2017, there have been seven recorded accidents close to the application site, five accidents classified with 'slight' injury accidents and two as 'serious'.

- 5.4.6 The two serious accidents both occurred at the A259 junction with a minor road linking to Colworth Manor House to the north of the application site access. One involved a van colliding with a cyclist in broad day light in June – approx. 4pm) and another where a car collided with a pedestrian at night-time (March– 7:30pm). Both serious accidents involved vulnerable road users. 4.10 One of the slight accidents occurred at the same junction (A259 / minor road north of the site) which involved a passing car driver colliding with parked car on the road. There was good visibility and the accident occurred during daylight hours.
- 5.4.7 The accident information confirms that there have been no accidents in close proximity to the existing site access junction and no accidents involving LGVs or HGVs likely to be associated with the site. Swept path analysis confirms the site access road can comfortably accommodate the vehicles visiting at the site.
- 5.4.8 None of the accidents that have occurred close to the site since 2017 have been a result of poor road layout or insufficient driver visibility at the junctions. The accidents have occurred due to a wide range of causation factors and there are no trends in accident types to suggest poor local highway design.

### Existing Traffic Movements

- 5.4.9 Due to increasing demand, the facility has been processing 50-55,000 tonnes of material per annum. This equates to approximately 110 HGV movements per day (55 in and 55 out). For the purposes of this Planning Application, the existing traffic movements are compared to the proposed increase by having regard to the approved throughput of material restricted in condition 11 of the existing planning permission.
- 5.4.10 On the basis of the existing permitted throughput of 30,000 tonnes per annum, traffic movements can be broken down as follows:

#### Incoming Deliveries:

- 5.4.11 Equate to  $30,000 \text{ tonnes} / 5 \text{ tonnes} = 6,000 \text{ movements per annum} / 250 \text{ days} = 24 \text{ loads by skip per day}$

#### Outgoing Collections:

- 5.4.12 Equate to  $30,000 \text{ tonnes} / 20 \text{ tonnes} = 1,500 \text{ movements per annum} / 250 \text{ days} = 6 \text{ loads by four-axled tipper per day}$ .

#### Total Movements (In and Out)

- 5.4.13 Having regard to the above, the total HGV movements therefore equate to:  $24 + 6 \text{ HGV arrivals and } 24 + 6 \text{ HGV departures} = 30 \text{ arrivals and } 30 \text{ departures} = 60 \text{ HGV movements per day}$ .

5.4.14 It is noted that there have been periods where the existing site has been handling up to 50-55,000 tonnes of waste per year (based on waste returns), which amounts to approximately 55 inbound and 55 outbound HGV movements per day. 88 of these movements are estimated to be the skip loader which is 6.5 metres in length. The remaining 22 are estimated to be four-axled tippers which typically measures 9 metres in length.

### **Proposed Vehicle Movements**

5.4.15 On the basis of the proposed throughput of 75,000 of waste material tonnes per annum, with average weight of 5 tonnes per skip load delivered to the site, and 20 tonnes per skip load collected from the site, the current HGV movements can be predicted as follows:

#### **Incoming Deliveries:**

5.4.16 Equate to  $75,000 \text{ tonnes} / 5 \text{ tonnes} = 15,000 \text{ movements per annum} / 250 \text{ days} = 60 \text{ incoming loads by skip per day}$ .

#### **Outgoing Collections:**

5.4.17 Equate to  $75,000 \text{ tonnes} / 20 \text{ tonnes} = 3,750 \text{ movements per annum} / 250 \text{ days} = 15 \text{ outgoing loads by four-axled tipper per day}$ .

#### **Total Movements (In and Out)**

5.4.18 Having regard to the above, the total HGV movements therefore equate to  $60 + 15 \text{ HGV arrivals and } 60 + 15 \text{ HGV departures} = 150 \text{ HGV movements per day}$ .

5.4.19 In terms of HGV movement, it can be predicted that the current facility typically generates approximately 75 inbound and 75 outbound HGV movements per day. 120 of these movements would be by a skip loader which is 6.5 metres in length. The remaining 30 would be by a four-axled tipper which typically measures 9 metres in length.

5.4.20 When allowing for staff, the total future trip demand for a 75,000 tonne handling capacity would be 164 movements per day, of which 14 are cars and 150 are HGVs.

5.4.21 The increase in traffic demands for the 75,000 tonne per year operation will introduce an additional 40 HGVs per day from the maximum recent operation (55,000 tonnes per year).

### Parking

- 5.4.22 The change in recycling operations and site layout will allow an increase in HGV parking to accommodate vehicles during the off-peak times. The operation of the recycling facility will only require the vehicles to be parked up overnight, other times the vehicles are either out collecting waste or in the yard loading/unloading waste.
- 5.4.23 The Applicant has another commercial site approximately 7 miles from the Site where HGVs can be stored as required.
- 5.4.24 The estimated additional 14 car movements per day would be associated with 7 additional staff working at the site. The development proposals will include dedicated car parking areas within the site to accommodate the required demands.

### Assessment of Impacts

- 5.4.25 In terms of assessed impacts, the Transport Statement concludes that the proposed traffic generation at the site in relation to a 75,000 throughput of waste material will result in a negligible rise in traffic movements along the A259 Chichester Road. The maximum rise could be 90 trips per day which leads to an increase of 0.66% of the recorded HGV proportion on the A259 (2014). Swept path analysis confirms the site access road can comfortably accommodate the vehicles used at the site.
- 5.4.26 The site operator acknowledges that right turning traffic at junctions creates conflicts between passing vehicle movements. In recent years, all HGV drivers travelling out of the site access on to the A259 Chichester Road are instructed to only undertake left turn movements only as presented on the swept paths in Appendix F of the Transport Statement report. Right turn movements into the site from the A259 will take place as required. This strategy seeks to provide the safest access arrangement for the application site and this approach will continue.
- 5.4.27 The Transport Statement notes that the largest type of vehicle that typically accesses the site associated with the waste management operations is a rigid four-axle, 9.0 metre tipper which generates approximately 30 movements per day (15 trips entering and 15 trips exiting the site). This amounts to no more than three per hour over the typical working day.
- 5.4.28 In terms of swept path analysis, the Transport Statement concludes:

*Swept path analysis indicates that a large tipper of 10m long (which includes the typical 9.0m long HGV) can safely access and egress the site using the current access junction, and this is*

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*presented on Motion Drawing 2003024-TK01 provided in Appendix C. 5.24 The site also occasionally accommodates articulated vehicles up to 16.5m long and vehicles are able to enter and exit without operational issue. The swept path for the 16.5m articulated vehicle is presented on Motion Drawing 2003024-TK02 also contained in Appendix D.*

- 5.4.29 In summary, the existing access arrangement serving the Application Site is considered to be suitable to accommodate the operational requirements for Recycle Southern Limited and arrangements are in place to make the access as safe as possible for HGV movements.

### **Internal Vehicle Operations – Swept Path Analysis**

- 5.4.30 Swept path analysis has been carried out within the development site to show the proposed vehicle movements within the site. The swept path analysis has previously been discussed with WSCC to show vehicles can enter and exit the site in a forward gear. The swept path plots are provided in Appendix E of the Transport Statement report.

### **Stage 1 Road Safety Audit**

- 5.4.31 Road Safety Audit has been prepared by Gateway TSP to offer an independent review of the predicted increase in trips along local highway routes including the road link to the Elbridge Farm access. The Road Safety Audit report is provided in Appendix F and the key points raised are as follows: “Clarification of cycle priority along the service road past the site access.”

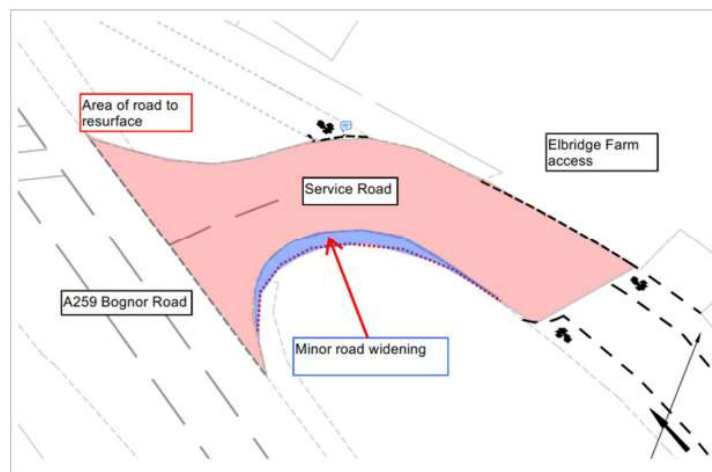
### **Cycle Priority**

- 5.4.32 In response, the local service road passing the site access is part of the old road network and forms a no-through road to cars. Cyclists are directed to a 300m section of the old Bognor Road onto a shared cycleway/footway to run parallel to the A259 for access between Chichester and Bognor Regis. The cycle route shares the footway alongside the A259 on other sections.
- 5.4.33 There are currently no clear cycle path markings on the cycle route past the Elbridge Farm access, these are either worn out or have never been considered. It may be noted that there are signs within the Elbridge Farm site to warn drivers of vehicles leaving the site that there is potential cycle activity on the Service Road as they approach the public highway.
- 5.4.34 Proposed enhancements to the cycle markings on the footway/road are presented on the Motion Drawing 2003024-GA01 (Appendix G to the Transport Statement) to make it clear that cyclists have priority. The purpose is to create a clear route for cyclists and to clarify that cyclists have priority over vehicles in and

out of the Application Site. The Applicant is happy for this to be secured by the appropriate planning mechanism on the basis planning permission is granted.

### Mud on the Road, Road Widening & Surface Improvements

5.4.35 The swept path analysis provided in Appendices C and D to the Transport Statement show that it is possible for drivers to egress onto the A259 without over-running the road edge but evidently drivers are using the edge of the road to manoeuvre. There is the potential for this part of the road to be improved to introduce local widening to reduce mud being deposited onto the road surface. The extent of the service road to be improved is presented on the image below. The road surface along the Service Road close to the access is part of the WSCC Highway network and is in poor condition.



5.4.36 A successful outcome of this proposal will also provide the Applicant the opportunity to re-surface the internal access to replace the loose bound aggregate surface with a tarmacadam/paving surface, which will enable the Applicant to keep the wheels of vehicles cleaner thereby minimising any mud on the road.

5.4.37 In summary, the proposed solution to address the mud issue is as follows:

- Install wheel cleaning facilities near the exit of the Site
- Re-surface the internal access road with tarmacadam/concrete
- Maintain Recycle Southern road-surface sweeping activities within the yard and on the service road; and,
- Provide contribution for minor road widening and road resurfacing on the Service Road to reduce damage to the grass verge and provide less opportunity for mud to be brought onto the local roads.

5.4.38 The proposed resurfacing/road widening would need to be formally agreed with WSCC.

## Conclusions

- 5.4.39 The proposed increase in site activity is likely to have resulted in trips increasing from the original 30,000 tonne handling estimate of 60 HGV trips per day, to 150 HGV trips a day, representing an increase of 90 HGV movements daily. However, the site has been operating at levels close to this capacity already with no detrimental impacts on the surrounding impacts on the highway network. Appropriate controls and mitigation measures can be secured by the imposition of planning conditions (or section 278 of the Highways Act in the case of the proposed road widening).
- 5.4.40 In overall terms, the Transport Statement concludes that the access is suitable for the proposed use and the increase in tonnages will not give rise to significant impact upon the highway network or compromise highway safety. It is therefore concluded that the application proposal is fully compliant with Policy 18 of the Waste Local Plan, Policy T SP1 of the Arun Local and the NPPF.

## 5.5 Noise

- 5.5.1 Policy W19 (Public Health and Amenity) of the Waste Local Plan states that proposals for waste development will be permitted provided that (inter alia) noise emissions, including those arising from traffic, are controlled to the extent that there will not be an unacceptable impact on public health and amenity.
- 5.5.2 Policy QE DM1 (Noise Pollution) of the Arun Local Plan states that:

*Developers proposing new noise generating development must seek advice from an early stage to determine the level of noise assessment required. Proposals will need to be supported by:*

*a. Evidence to demonstrate that there are no suitable alternative locations for the development.*

*b. A noise report which provides accurate information about the existing noise environment, and the likely impact of the proposed development upon the noise environment. The report must also demonstrate that the development meets appropriate national and local standards for noise, as set out in Annex 1 of the Planning Noise Advice Document: Sussex, and any mitigation measures required to ensure noise is managed to an acceptable level.*

*c. Evidence to demonstrate that the development will not impact upon areas identified and valued for their tranquillity, including Gaps Between Settlements which are important to the enjoyment of Arun's countryside, its habitats and biodiversity.*

- 5.5.3 A Noise Assessment is enclosed at Appendix 7 to this report which considers the potential noise impacts of the proposed development. The report notes that there are three properties, which are close to the existing recycling centre, Elbridge Farmhouse to the west and Elbridge Farm Cottages, which are located to the south of the site access.
- 5.5.4 Changes have additionally been made to improve safety on the site. A one-way route has been implemented for the vehicle movements around the site. The vehicles now enter through the entrance gate and drive around the site to leave through the emergency exit gate. This not only improves safety but reduces the requirement for the vehicles to reverse on site.
- 5.5.5 The recycling centre is split into two main areas, the inert tipping and processing area, located within the northern part of the site and the waste reception and picking station, located centrally within the site.
- 5.5.6 The inert tipping area is primarily used by vehicles tipping soils and rubble. The material is processed through a crusher and screen, which operate in this area and serviced by a number of excavators. It is proposed to increase the size of this area to enable additional materials to be stocked. Bunding would be provided to a height of 3.25 metres along the eastern boundary to provide visual screening.
- 5.5.7 Skip lorries deliver waste to the site and tip either in the main waste reception building or the secondary waste reception area, which is located between the buildings. A small number of loaders and an excavator work in this area, with the material sorted by hand, either on the reception floor to remove larger items or within the picking station.
- 5.5.8 There would be no changes to the existing plant operating on the site with the increased throughput, as the present plant has sufficient capacity. Thus, there would be no change in the noise levels attributable to the noise levels associated with the general site operations, other than associated with noise changes due to the relocation of the screening plant and inert picking line.
- 5.5.9 In order to evaluate the noise levels attributable to the current site operations, a noise monitoring exercise was carried out during the morning of Friday 11<sup>th</sup> February 2022. Weather conditions for the exercise were good, with dry and calm conditions throughout.
- 5.5.10 The exercise comprised noise monitoring adjacent to the three properties identified above, with source term measurements made adjacent to the principal plant operating on site and associated with the vehicle movements at the site entrance.



- 5.5.11 To supplement the noise measurements at the properties and to provide source data for the calculations and assessment of the noise levels attributable to the proposed operations, a series of measurements were taken around the site to evaluate the noise levels attributable to the main noise generating items of plant and associated with a number of vehicle passbys at the site entrance.
- 5.5.12 The noise monitoring results indicated that, with the exception of the noise from vehicles using the access, the noise levels attributable to the operation of the site were relatively low and were below the noise levels attributable to traffic travelling along the A259.
- 5.5.13 To provide a clearer indication of the site noise levels at the property, a noise model has been prepared for the site and its surroundings, utilising the SoundPlan computer modelling package.
- 5.5.14 A base model taking account of the existing plant operating on the site was developed and taking account of the existing typical vehicle movements of 24 skip lorries / 6 HGVs per day. Calculations have been made for a typical hourly period, to enable an assessment against BS 4142 to be made and on this basis, it has been assumed that there are typically up to 3 skip lorries per hour and 1 other HGV per hour.
- 5.5.15 The results of the noise modelling, based upon the typical passby noise level from a skip lorry are presented on Figure 2. Modelling has also been prepared on the basis of skip lorries with noisy chains to provide worst case conditions. The results are summarised below:
- Elbridge Farmhouse – 52 – 53 dB  $L_{Aeq, 1 \text{ hr}}$ ; and
  - Elbridge Farm Cottages – 55 – 58 dB  $L_{Aeq, 1 \text{ hr}}$ .
- 5.5.16 The initial assessment above indicates that the presently permitted operations are likely to result in a potential for a low impact at the neighbouring dwellings and thus seek to minimise any potential adverse impacts.
- 5.5.17 Taken into context, as required within the BS4142 assessment methodology, the noise levels attributable to the operation of the site are below the noise levels attributable to the road traffic using the A259, thus further reducing any potential adverse impact
- 5.5.18 It is clear, however, that the noise levels at the cottages are influenced by the vehicles using the access, in particular, the skip lorries. Noise from the skip lorries is dependent upon the quality of the road surface and the chains on the vehicles tend to rattle more when the vehicle passes over a bump or pothole. It is understood that Recycle Southern regularly maintain the access to ensure a good road surface is

maintained and by doing so, seek to minimise any potential adverse impacts at the properties. On this basis, the existing operations are generating acceptable levels of noise at the properties.

5.5.19 The increase tonnage would result in vehicle movements increasing by a factor of 2.5, with 60 skip lorries and 15 tippers anticipated to use the site per day. On this basis, there would be typically up to 8 skip lorries and 2 tipper lorries visiting the site per hour.

5.5.20 The results of the noise modelling, based upon the typical passby noise level from a skip lorry are presented on Figure 3 of the Noise Report. Modelling has also been prepared on the basis of skip lorries with noisy chains to provide worst case conditions. The results are summarised below:

- Elbridge Farmhouse – 56 – 57 dB  $L_{Aeq, 1 hr}$ ; and
- Elbridge Farm Cottages – 59 – 63 dB  $L_{Aeq, 1 hr}$ .

5.5.21 An initial assessment of the potential impacts attributable to the present site operations has been made against the requirements of BS 4142. The noise from the operation of the site was not considered to be tonal or impulsive in nature. However, the chains rattling on the skip lorries does clearly generate other characteristic noise and a correction of 3 dB has been made within the assessment to account for this. The assessment is provided below.

Description	Location	
	Elbridge Farmhouse	Elbridge Farm Cottages
Calculated Noise Level at Dwelling [dB $L_{Aeq, T}$ ]	56 – 57	59 – 63
Character Correction	3	3
Rating Level [dB $L_{Aeq, 1 hour}$ ]	59 – 60	62 – 66
Background Level [dB $L_{A90}$ ]	57	57
Excess Over Background	+2 – +3	+6 – +9
Likelihood of Impact	Indication of Low Impact	Indication of Low Impact / Indication of Adverse Impact

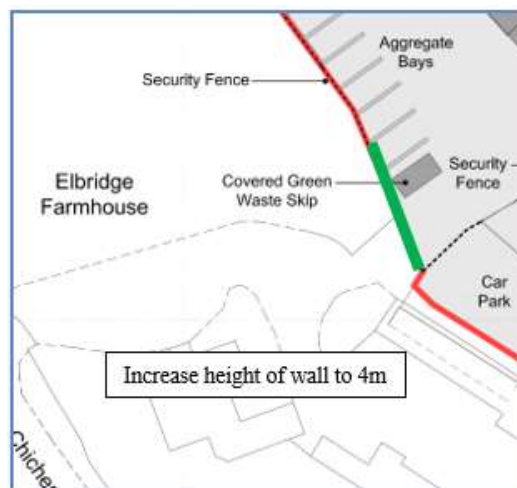
5.5.22 The increase in vehicle movements would result in an increase in noise levels at the neighbouring properties by up to 3 dB(A).

5.5.23 In addition, noise levels attributable to the operation of the screen would result in an increase in noise levels at Elbridge Farm Cottages.

5.5.24 As indicated in the table above, the increased output and amendments to the site layout would result in a potential for an adverse noise impact at the cottages, principally attributable to the noise from the

increased number of skip lorries and operation of the screen, with the overall noise levels attributable to the site equivalent to that associated with the general road traffic.

- 5.5.25 Additional noise mitigation and control measures would be implemented to ensure noise levels at the neighbouring properties remain acceptable. Clearly, the main source of noise and potential adverse impact is attributable to the chains rattling on the skip lorries.
- 5.5.26 To reduce noise levels associated with vehicles entering the site, the road surface would be resurfaced to provide a smooth surface, which would reduce the noise levels attributable to the vehicle bumping over the current rough surface considerably.
- 5.5.27 To further reduce noise from the skip lorries, it is recommended that the chains are fitted with sleeves. The use of chain sleeves provides a substantial reduction in noise levels from these vehicles, with typical reductions of up to 10 dB(A).
- 5.5.28 The height of the concrete lego block wall on the stock bays would be increased to a height of 4 metres and extended along the boundary adjacent to the main waste reception building, to provide additional screening at the farmhouse, as indicated below:



- 5.5.29 The additional height on the boundary would be provided either by the provision of a timber acoustic fence or other sound attenuating barrier (e.g. Echo barrier) attached to the existing lego blocks.
- 5.5.30 It is also proposed to construct an acoustic fence along the south western boundary adjacent to Elbridge Farm Cottages to mitigate noise from the proposed relocated screening operations, as indicated below.



5.5.31 The fence would be constructed to a height of 3.5 metres and would be a close boarded fence with a minimum surface density of 15 kg/m<sup>2</sup>.

5.5.32 Calculations have been prepared on the basis of the mitigated scheme. The calculation results are presented on Figure 4, which indicates the following noise levels:

- Elbridge Farmhouse – 52 dB L<sub>Aeq, 1 hr</sub>; and
- Elbridge Farm Cottages – 57 dB L<sub>Aeq, 1 hr</sub>.

5.5.33 The initial BS 4142 assessment, based upon the mitigated scenario, is presented below.

Description	Location	
	Elbridge Farmhouse	Elbridge Farm Cottages
Calculated Noise Level at Dwelling [dB L <sub>Aeq, T</sub> ]	52	57
Character Correction	3	3
Rating Level [dB L <sub>Aeq, 1 hour</sub> ]	55	60
Background Level [dB L <sub>A90</sub> ]	57	57
Excess Over Background	-2	+3
Likelihood of Impact	Indication of Low Impact	Indication of Low Impact

5.5.34 The assessment based upon the mitigated scheme, indicates that the noise levels at the neighbouring properties would remain equivalent to those associated with the presently permitted operations, with the assessment indicating a low potential for adverse impact.

5.5.35 The reduction in the high levels of noise from the chains rattling as the skip lorries pass the cottages would further seek to reduce any potential disturbance which may be associated with this source.

5.5.36 On this basis, with additional mitigation and control measures implemented, the additional throughput would not result in any increase in the potential for an adverse impact at the neighbouring properties, compared to the presently permitted operations.

### Conclusion

5.5.37 An assessment of the noise levels associated with the proposed development has been undertaken, which would be principally attributable to an increase in noise from the vehicle movement. The following mitigation measures would be implemented to ensure any changes in noise levels are minimised:

- Resurface the shared estate road at the entrance to the site;
- Ensure all skip lorries visiting the site are fitted with chain sleeves;
- Increase and extend the height of the existing concrete wall along the boundary with Elbridge Farmhouse to a height of 4 metres; and
- Provide an acoustic fence to a height of 3.5 metres along the south eastern boundary of the site, adjacent to Elbridge Farm Cottages.

5.5.38 With the mitigation measures implemented, the assessment concluded that there would be no discernible change in noise levels with the additional throughput and other changes to the operation of the site, with the assessment concluding a low potential for adverse impacts.

5.5.39 Having regard to the findings of the noise assessment, including the proposed mitigation measures, it is concluded that the proposed development is unlikely to give rise to unacceptable noise impacts on the locality of the site. The proposed development is therefore compliant with Policy W19 of the Waste Local Plan, Policy QE DM1 of the Arun Local Plan and national planning policy guidance.

## 5.6 Dust

5.6.1 Policy W19 of the Waste Local Plan deals with 'Public Health and Amenity' It states:

*Proposals for waste development will be permitted provided that: (a) lighting, dust, odours and other emissions, including those arising from traffic, are controlled to the extent that there will not be an unacceptable impact on public health and amenity;*

- 5.6.2 Policy QE DM3 (Air Pollution) of the Arun Local Plan requires development that generates dust, smell, fumes or other forms of pollution) to be located in such a position which ensures that the health, safety and amenity of users of the site or surrounding land is not put at risk and the quality of the environment would not be damaged or put at risk.
- 5.6.3 A Dust Suppression Scheme was approved by the Council in 2015 as part of a scheme to discharge 'pre-commencement' planning conditions. As part of this Planning Application, the Applicant has reviewed the management of dust on the site and developed a revised Dust Management Plan (DMP), which is enclosed at Appendix 8 to this statement.
- 5.6.4 The DMP sets out a range of dust management and mitigation measures (including the use of a dust/mist cannon) which will be employed on site to ensure that the recycling facility does not have an adverse impact as a result of dust on the nearby surrounding receptors including flora and fauna. The DMP includes a programme of monitoring, action plans and a complaints procedure.
- 5.6.5 The implementation of the DMP, which can be required by the imposition of a planning condition on the basis that this Planning Application is successful, to ensure that the proposal does not give rise to unacceptable dust impacts and is therefore compliant with Policy W19 of the Waste Local Plan and Policy QE DM3 of the Arun Local Plan.

## 5.7 Flood Risk and Surface Water Drainage

- 5.7.1 Policy W17 (Flooding) of the Waste Local Plan states that proposals for waste development will be permitted provided that:

*“(i) mitigation measures are provided to an appropriate standard so that there would not be an increased risk of flooding on the site or elsewhere;*

*(ii) they are compatible with Shoreline Management Plans and/or Catchment Flood Management Plans and the integrity of functional floodplains is maintained;*

*(iii) appropriate measures are used to manage surface water runoff including, where appropriate, the use of sustainable drainage systems (SUDS); and (iv) they would not have an unacceptable impact on the integrity of sea, tidal, or fluvial flood defences, or impede access for future maintenance and improvements of such defences.”*

- 5.7.2 Policy W DM2 (Flood Risk) of the Arun Local Plan and the NPPF have similar requirements. Policy W SP1 (Water) and Policy W DM1 (Water Supply and Quality) of the Arun Local Plan encourage the water

efficiency measures in order to protect the District's water resources and enhance the quality of the water environment which supports a range of habitats and ecosystems.

- 5.7.3 This Planning Application is supported by a Flood Risk Assessment (FRA) and Surface Water Drainage Strategy report, the full details of which are enclosed at Appendix 9 to this statement.
- 5.7.4 The FRA report notes that the site is located predominantly in Flood Zone 1, with a small section of the perimeter within Flood Zones 2 and 3. Flood level data has been obtained from the EA. The majority of the site is above all modelled flood levels. Maximum flood depths for the 1 in 1000-year tidal flood event have been modelled to be 3.06 mAOD, which could equate to 0.31 m depth of flooding in isolated locations adjacent to the watercourse on-site. No built development is proposed in this location, and there will be no loss in floodplain storage, therefore mitigation measures are not required. The site is therefore considered to be at low risk of flooding.
- 5.7.5 The site is considered to be at low risk of flooding from all other sources including Fluvial flow, Tidal, Pluvial (Surface water run-off), Groundwater flow and Sewer and/or water mains leakage.
- 5.7.6 Discharge from the site is currently unrestricted, and the rate and volume of run-off discharging into the Elbridge Rife currently increases with rainfall intensity. Post-development, flow from the impermeable area will be restricted to 5 l/s for all rainfall events, providing significant betterment over the existing situation.
- 5.7.7 To ensure the drainage system will not increase the rate and volume of surface water run-off leaving the site, underground cellular storage is proposed, along with a new orifice plate which will restrict flows to 5 l/s. The InfoDrainage model anticipates some flooding on-site during the 1 in 100-year + climate change flood event, however, the model does not consider water re-use on-site, or the storage and infiltration capacity of the filter drains.
- 5.7.8 The proposed extension area is currently permeable and free-draining and will remain so post development. A swale (no more than 1 foot deep) is proposed along the inside of the screening bund, to encourage infiltration and provide water quality benefits. All on-site surface water drainage infrastructure will remain privately owned. A maintenance schedule for the on-site drainage has been provided.
- 5.7.9 In overall terms, the report concludes that the proposed development is unlikely to give rise to an increase in flood risk and that surface water will be managed appropriately to ensure that pollution risk is minimised. The proposal therefore is compliant with Policy W17 of the Waste Local Plan, Policy W DM2

(Flood Risk), Policy W SP1 (Water) and Policy W DM1 of the Arun Local Plan and the requirements of the NPPF.

## 5.8 Historic Environment

- 5.8.1 Policy W15 (Historic Environment) of the Waste Local Plan seeks to ensure known features of historic or archaeological importance are conserved unless there are no alternative solutions and there are overriding reasons which outweigh the need to safeguard the value of sites or features. The National Planning Policy Framework at chapter 16 (conserving and enhancing the historic environment) and Policy HER DM6 (Sites of Archaeological Interest) of the Arun Local Plan have similar requirements to the Waste Local Plan.
- 5.8.2 A Heritage Statement is enclosed at Appendix 10 to this statement. The Heritage Statement includes a search of Chichester District Council's and West Sussex County Council's Historic Environment Records within a radius of 1km from the site. The records confirm that there are no designated heritage assets within the vicinity of the site, but it does lie within the North Bersted Multi-Period Archaeological Notification Area (DWS8448), as a result of previous archaeological investigations carried out to the south of the site.
- 5.8.3 The Heritage Statement notes that the site sits within a wider landscape comparatively rich in prehistoric and Roman remains, as evidenced by the excavated sites to the south and south-east. These are considered to be of local, regional and, in some cases, national importance, the latter being the case with the Late Iron Age warrior burial. It is considered likely that further such remains will exist within the area of the proposed extension to the existing site, which may be negatively impacted by any associated groundworks.
- 5.8.4 The impact of the proposed development upon the historic farm buildings and their setting is considered to be neutral, since all the additions and extensions to the existing site lie within the fenced area of the recycling centre, granted permission in 2014, which, together with its adjoining mature tree line, provides an effective screen. Furthermore, the historic map evidence, together with the 2013 aerial photograph, demonstrates that this has always been a working farm, with associated buildings and activity covering the area of the later recycling centre. The setting will therefore experience no significant change.
- 5.8.5 The impact of the proposed development upon any buried archaeological remains lying within the area of the extension to the north-east and south-east of the site has been mitigated by the developer agreeing that no groundworks (save for the small posts to support a concrete slab wall fronting the exterior soil



bund) will be carried out as part of this application. Instead, the existing plough soil will be retained, providing an effective protective layer for any underlying archaeological remains, with any surface treatments added on top (e.g. geotextile membrane and loose bound compacted hardcore). This will mirror the situation within the existing compound against its eastern boundary. It is therefore not considered that any archaeological intervention will be required in advance of or during development works.

- 5.8.6 The proposed drainage swale is not actually required for drainage purposes but is proposed to prevent puddles on the site surface in the event of heavy rain. The swale will be no more than 1 foot deep, it will not penetrate below the old ploughsoil, and therefore there will be no impact upon any buried archaeological remains.
- 5.8.7 In conclusions, it is considered that the works associated with this development will have a neutral impact upon the historic farmstead of Elbridge, and no impact upon any buried archaeological remains due to the absence of any associated groundworks. The proposal is therefore compliant with Policy W15 of the Waste Local Plan, Policy HER DM6 of the Arun Local Plan and the NPPF.

## 5.9 Soils

- 5.9.1 Policy SO DM1 (Soils) of the Arun Local Plan states that:

*Unless designated by this Plan or a Neighbourhood Development Plan, the use of Grades 1, 2 and 3a of the Agricultural Land Classification for any form of development not associated with agriculture, horticulture or forestry will not be permitted unless need for the development outweighs the need to protect such land in the long term.*

*The requirement to protect the best and most versatile land can be outweighed if it is demonstrated through sustainability and options appraisals that:*

- a. Preservation of land of lower agricultural quality has greater benefits in terms of ecosystem services (for example carbon storage, flood water retention, support of biodiversity);*
- b. That any site preferred for development is demonstrated to be the best and most sustainable option, including but not limited to the terms of land quality, ecosystem services, infrastructure and proven need; and*
- c. The proposed development meets the requirements of the countryside policy and/or equine development policy.*

- 5.9.2 The Application Site (the proposed extension area only) is likely to contain approximately 0.7 hectares of best and most versatile land, which will be lost as result of the proposed development in conflict with Policy SO DM1 (Soils) of the Arun Local Plan.
- 5.9.3 The Applicant has demonstrated through a waste needs assessment that the existing site provides a valuable contribution to diverting waste from landfill and increasing recycling rates in the area thereby complying with the aspirations of moving waste up the Waste Hierarchy and contributing to the Government's aspirations of moving towards a Circular Economy. The proposed extension and increase in throughput to the Site will also enable the WPA to meet and increase its own recycling capacity in compliance with national and local planning policies.
- 5.9.4 The proposed extension to the existing site is the only realistic reasonable option for meeting the waste management and recycling needs of the area and there are no reasonable alternatives site(s) available to Applicant within the search area.
- 5.9.5 In this case, there is an overriding need to avoid any groundworks (i.e. soil stripping) to ensure that any buried features of important archaeological value are preserved in-situ. The need for the proposed development, a lack of alternatives and preservation of any buried features of important archaeological value are considered to outweigh the loss of best and most versatile soils in the planning balance.

## 5.10 Lighting

- 5.10.1 A minimal approach to lighting is proposed to ensure lighting is kept to the minimum criteria to illuminate the task at the times which it is required (normally the darker winters months at the beginning and end of the day). Lighting will facilitate safe movement of pedestrians and vehicles and aid site security. Lighting will not be required outside of the existing/proposed hours of operation.
- 5.10.2 The proposal will involve the use of high-quality luminaires to ensure that light is focussed downwards onto the ground or other surfaces in the horizontal plane, minimising the potential for direct upward light, glare, light spill and light intrusion. It is proposed that column mounted luminaires (less than 3 metres in height) are only intended for the lighting of the site access, internal site road and the unadopted footpaths / parking areas.
- 5.10.3 The proposed strategy of using high-quality luminaires throughout the site to ensure that light is focussed downwards onto the ground will ensure that no unacceptable adverse residential or local amenity related impacts will arise in compliance Policy QE DM2 (Light pollution) of the Arun Local Plan.

## 6 CONCLUSION

### 6.1 The Planning Balance

- 6.1.1 The assessment of the proposed development has been assessed against the Development Plan and other material considerations. The Applicant's proposal is compliant with the locational criteria of Policy W3 of the Waste Local Plan by being located in the Areas of Search along the coast, subject to the environmental and local amenity impacts being acceptable. The proposal is concluded to be acceptable in principle by increasing waste management capacity at an existing and established waste management facility.
- 6.1.2 There is a clear market need to increase recycling capacity in the area and the Applicant's proposal is ideally situated to meet that demand. The proposal will therefore assist the Council in meeting an increasing demand for recycling capacity.
- 6.1.3 The assessment of alternatives has considered a number of reasonable site options in the locality of the existing site and has found that the current proposal represents a good alternative and there is no suitable alternative site within the search area.
- 6.1.4 Due to the relatively small size of the proposed extension area within the gap between Bognor Regis and Chichester, the proposal will not have a harmful urbanisation of the local rural environment or undermine the physical and visual separation of the settlements. The proposal will not therefore bring a physical or perceived coalescence of the two settlements. No adverse harm to the landscape character, appearance and function of this part of the settlement gap between Bognor Regis and Chichester will arise.
- 6.1.5 The assessment of 'need' has concluded that the proposal meets the general aim of Policy W1 part (a) as it will contribute to the capacity void left by the loss of the Horsham waste transfer facility. It will also meet the requirements of part (c) as the recycling of inert waste is catering for a local market need and is consistent with the principle of net self-sufficiency. The proposal would therefore make a significant contribution to reducing the resultant need for additional WTS capacity over the plan period.
- 6.1.6 The assessment of environmental or local amenity issues, informed by supporting technical specialist reports, concludes that the proposal is unlikely to give rise to any unacceptable impacts. The operations can be controlled by the imposition of planning conditions in parallel with the controls of the Environmental Permitting Regulations 2016.

6.1.7 Overall, it is concluded that the proposal is compliant with the thrust of the Development Plan and national planning policy guidance and there are no known planning reasons why this Planning Application cannot be supported by the Waste Planning Authority.

**APPENDIX 1: PLANNING PERMISSION REF. WSCC/036/14/BE**

## APPENDIX 2: STRUCTURES SCHEDULE

## APPENDIX 3: ALTERNATIVE SITE ASSESSMENT

## APPENDIX 4: LANDSCAPE & VISUAL APPRAISAL



## APPENDIX 5: ECOLOGY ASSESSMENT

**APPENDIX 6: TRANSPORT STATEMENT**

## APPENDIX 7: NOISE ASSESSMENT

## APPENDIX 8: DUST MANAGEMENT PLAN

## APPENDIX 9: FLOOD RISK ASSESSMENT & SURFACE WATER DRAINAGE

## APPENDIX 10: HERITAGE STATEMENT

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